

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,

Plaintiff/Counter-Defendant,

v.

HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff

HONOR SOCIETY FOUNDATION, INC.,

Defendant.

Civil Action No. 3:22-cv-00208-CWR-RPM

HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff/Third-
Party Plaintiff

v.

LYNN TINCHER-LADNER,

Third-Party Defendant.

**SUPPLEMENTAL DECLARATION OF DEREK LINKE IN SUPPORT OF MOTION
TO EXCLUDE EXPERT TESTIMONY OF JEFFREY PARKHURST**

I, Derek Linke, hereby declare, under 28 U.S.C. § 1746, as follows:

1. I am over 18 years of age, competent to testify to the matters stated herein, and make this declaration on the basis of personal knowledge.
2. I am an attorney at Newman LLP, and counsel of record for defendants HonorSociety.org Inc. and Honor Society Foundation, Inc. in this action.
3. This declaration is filed in further support of HonorSociety's Motion to Exclude Expert Testimony of Jeffrey Parkhurst.
4. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the transcript of the September 20, 2024 deposition of Jeffrey Parkhurst.

I declare under the penalty of perjury under the laws of the United States of America that, to the best of my knowledge, the foregoing is true and correct.

Executed March 7, 2025

s/Derek Linke
Derek Linke